Automated Commercial Environment—Requirements Recommendation

Date:	06/13/03
Number:	ACT - 12
Requestor:	Broker Account Subcommittee
Customs Co-Chair:	Jim Casler (Committee) Kimra Coons (Subcommittee)
Trade Co-Chair:	Lori Goldberg (Committee) Jake Holzscheiter (Subcommittee)

Requirement

As part of the overall Automated Commercial Environment Broker Portal, there are different levels of access which brokers would want to grant members of their organization.

Taken from the level of a broker operating in a single port to a multi-national broker with a corporate officer in charge of compliance who then delegates responsibility to a series of managers at regional or branch levels, there will be such a large volume of data which can be seen, queried, or downloaded, that it is important that *only* those individuals who have a right to review, aggregate, query or download data are allowed to do so.

For instance, allowing an entry clerk the ability to respond to CF-28's or 29's would not be within their scope responsibility, nor should they have the ability to see filer statistics for multiple ports within a geographic region. Perhaps they should not even be allowed more than the basic "snapshot" data and allowed to view only. These are issues which must be resolved within a broker's specific structure.

The Broker Account Subcommittee feels that there needs to be limited user access levels, determined by the responsible party at a broker, for their employees to either view, query or download data depending upon their position within the brokerage company.

Business Need

Under the auspices of such concepts as "informed compliance", "due diligence" and general corporate responsibility and governance, employees who are not entitled to either access or alter entry data, broker statistics or should not be communicating directly with Customs cannot be placed in a position to do so. The responsible corporate license holder for a Customs broker should be able to grant varying degrees of authority to view, query, aggregate, download or respond to data as they so choose. The failure to grant these necessary levels of permission and access will undermine a broker's compliance efforts and could jeopardize their rejection rates or increase their chances of being subjected to a broker compliance audit for entry irregularities.

Technical Need

The Trade Support Network must devise a way for brokers to be able to aggregate any and all data which would be collected for display in the portal and sort it based on the authority of the individual granted by their corporate license holder. There should be operational level data where entry writers would see only the data pertinent to their office. There should be managerial level data displayed which gives access to single or multi-port data pertinent to branches under their control. There should even be regional-level data where a manager (say of the geographically dependent 'Northeast' or 'Midwest' is allowed to view their data only) to determine how the offices under their control are working. The entry filing data should be able to be tracked all the way to the branch which filed the entry.

Benefits

Every broker realizes the inherent risks and responsibilities of filing entries. For a corporate officer or individual charged with overseeing compliance at a branch, regional or national level, there are no

effective ways to compile the data to determine compliance levels or if there are problems which are endemic of a poor system or are isolated to an individual or branch. By having access to this data through the broker account portal, and by being able to download, sort, query, aggregate, and audit any and all data which Customs collects pertaining to entry and centralizing the communication efforts between brokers, Customs and the trade, theoretically the overall compliance rates should go up even further and Customs can see a more cohesive and centralized method of communicating with a broker and insure that their inquiries are answered in a timely basis.

Risks

As with any effort in which users abilities and access are restricted by their stature or position within a company, it is key to insure that users maintain the confidentiality of their usernames and passwords and do not allow unauthorized users access to their level if they are not entitled.

Related Subcommittees

Priority: **Critical**   ☒   **High**   ☐   **Medium**   ☐   **Low**   ☐